

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

In re:	§	
	§	CASE NO. 11-41301-JTL
Pedro Jose Burgos,	§	
	§	CHAPTER 13
Debtor.	§	
<hr style="border-top: 1px dashed black;"/>		
American Home Mortgage Servicing, Inc.	§	
Movant,	§	JUDGE: JOHN T. LANEY, III
v.	§	
Pedro Jose Burgos,	§	
Debtor,	§	
Kristin Hurst, Trustee,	§	
Respondents.	§	

OBJECTION TO CONFIRMATION

COMES NOW, American Home Mortgage Servicing, Inc., and makes and files its Objection to the Confirmation of the Debtor's Chapter 13 plan for the reasons set forth below:

1.

American Home Mortgage Servicing, Inc. holds a first priority deed to secure debt on the Debtor's property located at 7440 McKee Road, Upatoi, GA 31829-1712.

2.

The Debtor's plan fails to list arrearage owed to American Home Mortgage Servicing, Inc..

3.

Movant has filed a proof of claim with an arrearage amount of \$18,128.44.

4.

The Debtor's plan is inaccurate and does not provide American Home Mortgage Servicing, Inc. with adequate protection.

THEREFORE, based upon the above and foregoing facts American Home Mortgage Servicing, Inc. objects to the Confirmation of the Debtor's Chapter 13 Plan.

This the 8-Mar-12

Respectfully Submitted

RICHARD B. MANER, P.C.

/s/ Richard B. Maner

Richard B. Maner, GA Bar No. 486588

Attorney for Movant

5775 Glenridge Drive

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CERTIFICATE OF SERVICE

This is to certify that I have served a copy of Movant's **OBJECTION TO CONFIRMATION** by depositing same in the United States Mail in a properly addressed envelope to each with adequate postage thereon as follows:

Pedro Jose Burgos
3115 Mercury Drive
Columbus, GA 31906

Kristin Hurst
Chapter 13 Trustee
P.O. Box 1907
Columbus, GA 31902

This the 8-Mar-12

/s/ Richard B. Maner

Richard B. Maner, GA Bar No. 486588

Attorney for Movant

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